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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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KENNETH FRIEDMAN, #80952

) CASE NO.: 2:13-cv-01345-JCM-CWH

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Plaintiff,

)  
DEFENDANTS' MOTION FOR  
ENLARGEMENT OF TIME TO  
RESPOND TO PLAINTIFF'S MOTIONS  
UNDER DKT. NUMBERS 35-37  
(FIRST REQUEST)

25 vs.

26 LINDA ADAMS, et al.,

27 Defendants.

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Defendants Robert Bannister, Joseph Hanson, Linda Adams and Doni K. Jennings, by and through counsel, ADAM PAUL LAXALT, Attorney General of the State of Nevada, and CAROLINE BATEMAN, Deputy Attorney General, hereby move for an enlargement of time for

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1 the filing of their responses to Plaintiff's Motions under Dkt. Numbers 35-37 pursuant to Local  
2 Rule 6-1.

3 DATED this 22nd day of June, 2015

4 Respectfully submitted,

5 ADAM PAUL LAXALT  
6 Nevada Attorney General

7 By: /s/ Caroline Bateman  
8 CAROLINE BATEMAN  
9 Deputy Attorney General  
10 *Attorneys for Defendants*  
11 *Robert Bannister, Joseph Hanson,*  
*Linda Adams, and Doni K. Jennings*

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. PROCEDURAL HISTORY**

14 This is a *pro se* civil rights action filed by Plaintiff Kenneth Friedman ("Plaintiff"), who is  
15 an inmate in the custody of the Nevada Department of Corrections. On June 3, 2015, Plaintiff  
16 filed the following motions: Plaintiff's Second Motion to Compel Discovery (Dkt. #35); Plaintiff's  
17 Motion for Sanctions regarding Discovery (Dkt. #36); and Plaintiff's Motion to Extend  
18 Discovery (Dkt. #37). Defendants now move for an enlargement of time of five (5) days to  
19 respond to Plaintiff's Motion to Compel, Motion for Sanctions, and Motion to Extend  
20 Discovery.

21 **II. LEGAL ANALYSIS**

22 The Court has broad discretion in supervising the pretrial phase of litigation. See  
23 *Zivkovic v. S. Cal. Edison Co.*, 302 F.3d 1080, 1087 (9th Cir. 2002). Under LR 6-1, a motion  
24 for extension of time must state the reasons for the extension requested and inform the Court  
25 of any previous extensions granted.

26 Defendants respectfully request that this Court find that they have demonstrated good  
27 cause for their first requested extension to respond to Plaintiff's Motions under Dkt. Numbers  
28 35-37. Undersigned counsel for Defendants recently took over the representation of this case

1 from prior counsel. As the contents of Plaintiff's motions concern discovery that was  
2 completed by prior counsel, as well as conversations between Plaintiff and prior counsel,  
3 Defendants request an enlargement of time so that current counsel can confer with prior  
4 counsel and provide accurate responses to Plaintiff's motions.

5 As such, Defendants' counsel respectfully requests the deadline for responses to Dkts.  
6 35-37 be continued for a period of five (5) days.

7 **III. CONCLUSION**

8 Based on the foregoing, Defendants respectfully request an extension of five (5) days  
9 to file their responses to Plaintiff's Motions under Dkt. Numbers 35-37.

10 DATED this 22nd day of June, 2015

11 Respectfully submitted,

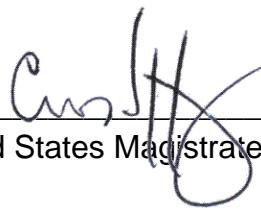
12 ADAM PAUL LAXALT  
13 Nevada Attorney General

14 By: /s/ Caroline Bateman  
15 CAROLINE BATEMAN  
16 Deputy Attorney General  
17 *Attorneys for Defendants*  
18 *Robert Bannister, Joseph Hanson,*  
*Linda Adams, and Doni K. Jennings*

19 **ORDER**

20 IT IS SO ORDERED.

21 DATED: June 23, 2015

22   
United States Magistrate Judge

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on the 22nd day of June, 2015, I served the foregoing, **DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S MOTIONS UNDER DKT. NUMBERS 35-37 (FIRST REQUEST)**, by causing a true and correct copy thereof to be filed with the Clerk of the Court, using the electronic filing system, and by causing a true and correct copy thereof to be delivered to the Department of General Services, for mailing at Las Vegas, Nevada, addressed to the following:

Martinez S. Aytch #54102  
Lovelock Correctional Center  
1200 Prison Road  
Lovelock, Nevada 89419  
*Plaintiff, Pro Se*

/s/ Carol A. Knight  
CAROL A. KNIGHT  
An employee of:  
STATE OF NEVADA  
OFFICE OF THE ATTORNEY GENERAL